

IN THE FAUQUIER CIRCUIT COURT OF VIRGINIA
20th Judicial Circuit of Virginia
29 Ashby Street, Warrenton, VA 20186-3202

Deirdre Ann White
9521 James Madison HWY,
Warrenton, VA 20167

: **Dreams Auto Warrenton, Inc.**
71 S. 5th St, Suite B,
Warrenton, VA 20186

: **Alva, Ivan E.**
5908 Cove Landing Rd., Apt 204,
Burke, VA, 22015

Plaintiff

: **Defendants**

Filed: 4/14/2020

Civil Action No: 061CL2020021320

Jury Trial Requested

RECEIVED

APR 06 2021

ALEXANDRIA DIVISION
US BANKRUPTCY COURT

COMPLAINT

Plaintiffs Deidre Ann White, by counsel, hereby brings this action against Defendants Alva, Ivan E. and Dreams Auto Warrenton, Inc., for the actions specified herein-below.

PARTIES

1. Plaintiff Deidre Ann White [hereinafter White] is a resident of Virginia with a residential address located at 9521 James Madison HWY, Warrenton, VA 20167.
2. Defendant Alva, Ivan E. [hereinafter Alva] is a resident of Virginia with a residential address of 5908 Cove Landing Rd., Apt 204, Burke, VA, 22015.
3. Dreams Auto Warrenton [hereinafter Dreams] is a Virginia company with a principal office located at 71 S. 5th St, Suite B, Warrenton, VA 20186, USA; and an entity ID 04383824. Its registered agent is Mr. Alva, Ivan E.

15. White took the Acura to an automotive mechanic. After running many diagnoses, the mechanic confirms there is an engine problem.
16. Upon removing casing to inspect the engine thermostat, it was discovered the entire open-and-shut-valve mechanism of the thermostat is removed. In essence, the thermostat features are removed. By so doing the engine is modified to operate without a thermostat and becomes unstable.
17. When a fully functioning thermostat is installed, the Acura would not start at all.

Count I – Actual Fraud on Defective Engine

18. All paragraphs asserted above and below are incorporated herein with the same force and effect.
19. Alva and Dreams made a misrepresentation of a present and material fact that the Acura is in a good working condition and is a reliable vehicle.
20. Alva and Dreams knowingly and intentionally made this misrepresentation with the intent to mislead White to purchase the vehicle believing it is in a good working condition and is a reliable vehicle.
21. White reasonably relied upon the misrepresentation of Alva and Dreams and purchased the Acura.
22. White suffered loss in the purchase of the Acura because it has an engine problem that was intentionally concealed by replacing a functional thermostat with a dysfunctional thermostat.

**Law Offices Of
LAU & ASSOCIATES, LLC**

Michael N. Lau
Licensed in VA, DC, IL and US Patent
& Trademark Office

10517 West Drive
Unit B
Fairfax, VA 22030, USA

703-637-0488

RECEIVED

Facsimile: 703-644-4303
Michael_Lau_@Yahoo.com

APR 06 2021

ALEXANDRIA DIVISION
US BANKRUPTCY COURT

Federal Courts

-U.S. Supreme Court
-Court of Appeals of the Federal Circuit
-Fourth Circuit Court of Appeal
-U.S. District Court – Eastern & Western
Districts of Virginia

President of Government Intellectual
Property Law Association 2010-2012

BY HAND-DELIVERY

MARCH 30, 2021

United States Bankruptcy Court-Eastern District of Virginia
200 South Washington Street, Room 100
Alexandria, VA 22314

OBJECTION TO DISCHARGABLE DEBT

RE: United States Bankruptcy Court Eastern District of Virginia
Case No. 21-10325-BFK
Chapter 7 Bankruptcy of Ivan Eduardo Alva

United States Bankruptcy Court:

This is an objection to discharge debt and/or to challenge whether Certain Debts are dischargeable.

Attached are:

1) a Complaint filed to Fauquier Circuit Court on April 14, 2020. The case caption is *Deirdre Ann White v. Dreams Auto Warrenton, Inc. & Ivan E. Alva*. It is a civil Action with a case no.: CL 20-215; and

2) a check in the amount of \$350.00 for this filing.

This is a suit against Co-Defendant Ivan E. Alva, for fraud and misrepresentation in the selling of a vehicle to Deirdre White. I am her legal counsel. Under 11 U.S.C. § 523(a)(4), *inter alia*, debts arise from fraud or defalcation are not dischargeable. I appear *pro se* to protect the award of legal fees to me in handling this misrepresentation/fraud case.

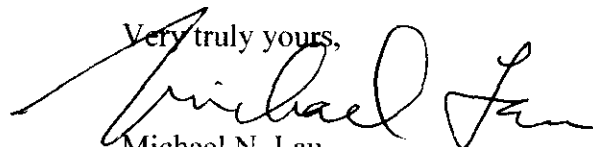
Certificate of Delivery

The Undersigned certify a copy of this letter, complaint and Check No. 673, as of March 30, 2021, are hand-delivered to: United States Bankruptcy Court-Eastern District of Virginia, at 200 South Washington Street, Room 100, Alexandria, VA 22314

1st class mail to:
Suad Bektic, New Day Legal, PLLC, 98 Alexandria Pike, Suite 10, Warrenton, VA 20186, 540-349-3232; sbektic@newdaylegal.com

Donald F. King, 1775 Wiehle Avenue, Suite 400, Reston, VA 20190, 703-218-2100;
kingtrustee@ofplaw.com

Very truly yours,

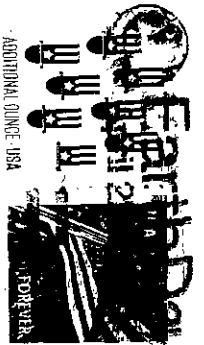


Michael N. Lau

VSF 72614, appearing *pro se* to protect any
award of legal fees in handling a fraud case

THE LAW OFFICES OF
LAU & ASSOCIATES, LLC
10517 WEST DRIVE, UNIT B
FAIRFAX, VA 22030
USA

NOVA 220
6 APR 2021 PM 3 L



United States Bankruptcy Court-Eastern District
of Virginia
200 South Washington Street, Room 100
Alexandria, VA 22314

22314-540699

